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12 *Attorneys for Plaintiff Bank of America, N.A.,  
13 Successor by Merger to BAC Home Loans Servicing,  
14 LP, f/k/a Countrywide Home Loans Servicing, LP*

15 **UNITED STATES DISTRICT COURT  
16 DISTRICT OF NEVADA**

17 BANK OF AMERICA, N.A., SUCCESSOR BY  
18 MERGER TO BAC HOME LOANS  
19 SERVICING, LP, FKA COUNTRYWIDE  
20 HOME LOANS SERVICING LP,

21 Case No.: 2:16-cv-00508-RFB-EJY

22 **JOINT STATUS REPORT REGARDING  
SETTLEMENT**

23 Plaintiff,

24 vs.

25 MESA AND VALLA AT MOUNTAIN'S EDGE  
26 HOMEOWNERS' ASSOCIATION; PREMIER  
27 ONE HOLDINGS, INC.; LJS&G, LTD., D/B/A  
28 LEACH JOHNSON SONG & GRUCHOW;  
KUIHUA WANG; and WANBIAO LI,

29 Defendants.

30 Bank of America, N.A., successor by merger to BAC Home Loans Servicing, LP, f/k/a  
31 Countrywide Home Loans Servicing, LP (**BANA**), Mesa and Valla at Mountain's Edge Homeowners'  
32 Association (**HOA**), Kuihua Wang, and Wanbiao Li submit this joint status report to advise the court  
33 regarding the status of settlement. A global resolution of this matter is nearly complete. The  
34 bankruptcy court approved the settlement between BANA and Premier One Holdings Inc. and recently  
35 terminated the automatic stay in favor of BANA. **Ex. 1.** BANA also settled with the HOA which was  
36

1 contingent on the bankruptcy court terminating the automatic stay. The HOA recently executed the  
 2 settlement agreement and BANA anticipates execution in the next two weeks. The parties anticipate  
 3 filing a stipulated judgment upon execution and fulfilment of terms of the BANA/HOA settlement  
 4 agreement. The parties request the court issue another minute order, ordering a stipulated judgment,  
 5 other dismissal documents, or a joint status report be filed on or before May 31, 2023.

6 DATED this 31st day of March, 2023.

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 12 *Attorneys for Mesa and Valla at Mountain's Edge Homeowners' Association*

13 **MORRIS LAW CENTER**

14 /s/ Timothy A. Wiseman  
 15 SARAH A. MORRIS, ESQ.  
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 16 TIMOTHY A. WISEMAN, ESQ.  
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 17 5450 W. Sahara Ave., Suite 330  
 Las Vegas, Nevada 89146  
 18 *Attorneys for Kuihua Wang and Wanbiao Li*

19 **IT IS SO ORDERED.**



20  
 21 RICHARD F. BOULWARE, II  
 22 UNITED STATES DISTRICT JUDGE  
 23

24 Case No. 2:16-cv-00508-RFB-EJY

25 **DATED:** March 31, 2023.

1 INDEX OF EXHIBITS

2 Exhibit 1 Order Approving Stipulation to Terminate Stay

AKERMAN LLP

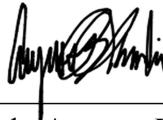
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# **EXHIBIT 1**

## **ORDER APPROVING STIPULATION TO TERMINATE STAY**

# **EXHIBIT 1**



Honorable August B. Landis  
United States Bankruptcy Judge



Entered on Docket  
March 06, 2023

**BRIAN D. SHAPIRO, ESQ.**

Nevada Bar No. 5772  
510 S. 8<sup>th</sup> Street  
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(702) 386-8600 Fax (702) 383-0994  
brian@brianshapirolaw.com  
Attorney for Trustee

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In Re:

PREMIER ONE HOLDINGS,  
INC.

Case No. 22-10734-ABL  
Chapter 7

**ORDER APPROVING STIPULATION TO  
TERMINATE STAY**

Debtor(s).

BRIAN D. SHAPIRO, Trustee ("Trustee"), by and through the Law Office of Brian D. Shapiro, LLC and Bank of America, N.A. ("BANA") by and through its counsel Scott Lachman, Esq. of Akerman LLP having entered into a stipulation to terminate stay that was required to be submitted pursuant to a settlement agreement which was approved by the Bankruptcy Court by Court Order on February 21, 2023. The Court having reviewed the stipulation, good cause appearing therefore it is hereby

1 ORDERED, that the stipulation to terminate stay, a filed stamp copy of which is attached  
2 hereto as Exhibit 1 ("Stipulation"), is approved. It is further

3 ORDERED, that in accordance with the Stipulation, the automatic stay contained within  
4 11 USC §362 is hereby terminated in favor of BANA so that it may proceed in the Litigation and  
5 foreclose on its Loan on the Real Property as those terms are defined in the Stipulation.  
6

7  
8 SUBMITTED BY:

9 LAW OFFICE OF BRIAN D. SHAPIRO  
10

11 By: /s/ Brian D. Shapiro  
12 BRIAN D. SHAPIRO, ESQ.  
13 Law Office of Brian D. Shapiro, LLC  
14 510 S. 8th Street  
15 Las Vegas, NV 89101  
16 Telephone: (702) 386-8600  
17 Facsimile: (702) 383-0994  
18 Attorney for Trustee  
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# EXHIBIT 1

1 **BRIAN D. SHAPIRO, ESQ.**

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7 Attorney for Trustee

8 **UNITED STATES BANKRUPTCY COURT**  
9 **DISTRICT OF NEVADA**

10 In Re:

11 PREMIER ONE HOLDINGS,  
12 INC.

13 Case No. 22-10734-ABL  
14 Chapter 7

15 **STIPULATION TO TERMINATE STAY**

16  
17 Debtor(s).

18 BRIAN D. SHAPIRO, Trustee (“Trustee”), by and through the Law Office of Brian D.  
19 Shapiro, LLC and Bank of America, N.A. (“BANA”) by and through its counsel Scott Lachman,  
20 Esq. of Akerman LLP hereby state:

21 WHEREAS, BANA is the beneficiary of record of a deed of trust recorded with the Clark  
22 County Recorder on January 23, 2009 as Instrument Number 20090123-0001786) to secure a  
23 promissory note in the original principal amount of \$286,157 (the promissory note and deed of  
24 trust are collectively referred to herein as the “Loan”) against the property located at 7316  
25 Childers Avenue, Las Vegas, NV 89178 (“Real Property”).

1 WHEREAS, the Debtor acquired the Real Property based upon a HOA sale and  
2 foreclosure deed recorded with the Clark County Recorder on September 17, 2013 as Instrument  
3 No. 20130917-0001655.

4 WHEREAS, on March 8, 2016, BANA initiated a lawsuit against the Debtor, among  
5 others, in the United States District Court, District of Nevada with case number 2:16-cv-00508  
6 (“Litigation”).  
7

8 WHEREAS, on March 2, 2022, the Debtor filed a Chapter 7 Voluntary Bankruptcy  
9 petition within the United States Bankruptcy Court, District of Nevada (“Bankruptcy Court”)  
10 with case number 22-10734-abl (“Bankruptcy Case”).  
11

12 WHEREAS, Brian D. Shapiro is the Trustee of the Bankruptcy Case.  
13

14 WHEREAS, the Trustee and BANA resolved the Litigation through a settlement  
15 agreement (“Settlement Agreement”) which was approved by the Bankruptcy Court by Court  
16 Order on February 21, 2023. (“Settlement Order”).  
17

18 WHEREAS, pursuant to the Settlement Agreement, the Trustee of the Bankruptcy Case  
19 agreed to enter into a stipulation to terminate the stay in favor of BANA so that it may obtain an  
20 applicable order in the Litigation and foreclose on its Loan on the Real Property.  
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1 NOW THEREFORE, IT IS HEREBY AGREED:

2 1. The above recitals are incorporated herein as if fully set forth herein.

3 2. In accordance with the terms of the Settlement Agreement, the automatic stay  
4 contained within 11 USC §362 is hereby terminated in favor of BANA so that it may  
5 proceed in the Litigation and foreclose on its Loan on the Real Property.

6 3. The Trustee is authorized to file this stipulation with the Bankruptcy Court and obtain  
7 an order by ex parte request to approve this stipulation with the Bankruptcy Court.

8

9 10 AKERMAN LLP

11 12 LAW OFFICE OF BRIAN D. SHAPIRO

13 By: /s/ Scott Lachman, Esq.\*  
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20 Attorney for BANA  
21 \*electronic signature authorized via  
22 email

23 By: /s/ Brian D. Shapiro  
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